



Testimony of AfterSchool Works! NY: the New York State Afterschool Network
Before the
Office of Children and Family Services
January 26, 2016

AfterSchool Works! NY: the New York State Afterschool Network (ASW:NYSAN) is a statewide nonprofit designed to strengthen the commitment and capacity of communities, programs, and professionals to increase access to high-quality programs and services beyond the traditional classroom. ASW:NYSAN wants to see all of New York's children and youth provided with access to high-quality expanded learning and development opportunities that will support their success in school, college, work, and life.

We would like to acknowledge OCFS for the opportunity to present testimony to you today regarding the Child Care and Development Fund plan for New York State. We appreciate the time OCFS put into drafting this plan and hope that you will take into consideration these additional recommendations to support children and families in New York State.

1.4 Coordination with Partners to Expand Accessibility and Continuity of Care:

1.4.1 CCDF calls for a plan to coordinate child care services to expand accessibility and continuity of care, and assist children enrolled in early childhood programs to receive full-day services that meet the needs of working families. In order to assist children enrolled in Pre-K programs to receive services for the full work day, ASW:NYSAN recommends that OCFS update policy statement 00-3 regarding Pre-K students in School-Age Child Care programs to move out of a waiver system. The policy should apply to all programs and should not require a waiver.

The CCDF requires states to place greater emphasis on serving homeless families and children. The federal regulations delineate situations where copayments can be waived and also allows states the flexibility to establish other criteria to waive copayments. As written, New York's plan does not specifically address copayments by homeless families. It is our recommendation that New York should amend the Social Services Law to provide that:

- Homeless families must be given categorical eligibility and priority for child care subsidies, regardless of whether they are working, looking for work, looking for housing, or engaged in other services;
- Copayments should be waived for homeless families;
- The enhanced rate for child care for homeless families should not be a local option; and
- The enhanced rate for the payment of child care for homeless families should be uniform across the state.

4.5 Payment Practices and Timeliness of Payments

4.5.1 To support the CCDF requirements to reflect generally accepted payment practices of non-CCDF child care providers to provide stability of funding and encourage more child care providers to participate in the subsidy program, ASW:NYSAN recommends that payment to providers be made in advance and on the basis of enrollment. This will best support quality programming by ensuring stable funding and in turn, higher quality programming.

5.3 Criminal Background Checks

5.3 Given the new, more rigorous, criminal background and fingerprinting process, ASW:NYSAN recommends that OCFS continue to pursue options to remove requirements for duplicative fingerprinting of program staff that are also required to be fingerprinted through the State Education Department, reducing the costs for the state. ASW:NYSAN also recommends continued assumption of costs by the state for fingerprints and not passing this cost on to the provider nor the program staff. Any further fees pushed onto providers will contribute to a reduction of quality and/or students served in programs.

7.4 Child Care Resource and Referral

7.4 The network of CCR&R's brings tremendous resources to the child care field, however, these agencies are significantly lacking staff that specialize in school-age care. Given that one-third of the children served by CCDF funds are school age, it is our recommendation that each CCR&R should have at least one staff member dedicated to working with school-age programs, and additional staff should be proportional to the number of school-aged children receiving subsidies in their network.

7.6 Evaluating and Assessing the Quality and Effectiveness of Child Care Programs and Services

7.6.2 The State and OCFS recognize that QUALITYstarsNY has not yet gone statewide, nor is it funded for school-age programs. Given the lack of funding to support the expansion of QUALITYstarsNY to school-age, ASW:NYSAN recommends a statewide data system that would include outcomes measures for youth in school-age child care. This would support growth in program quality by providing a systematic approach to gathering and analyzing outcomes from programs. Furthermore, a statewide data system allows programs the ability to measure their progress against clear objectives, supports improvement of existing programs, and allows programs the opportunity to invest their limited resources in other areas of quality programming.

7.9 Other Quality Improvement Activities

7.9.1 As previously mentioned, QUALITYstarsNY is still unfunded for school-age programs. Other methods are needed to assist in program quality improvement. In addition to trainings on the Quality Self-Assessment (QSA) Tool, ASW:NYSAN and our partners are able to offer professional development and conference opportunities for school-age providers, as well as develop targeted technical assistance to further meet the needs of providers with support from OCFS.

Conclusion

ASW:NYSAN is committed to being a partner to OCFS and the State to achieve greater access and higher quality programming for our children and families. However, we are concerned at the high costs to implement the plan as required. With the Department of Budget's estimate of \$90 million to implement one of the eight standards, we must ask where the other funding is coming from.

The number of children served by CCDF continues to fall each year. We do not want anymore reductions in the number of children served, nor do we want the quality of programs to decrease to support these mandates. The field is not prepared to assume additional costs to meet these mandates. Every effort must be made to ensure additional costs are not passed down to providers.

This is why it is essential that the CCDF plan strategically aligns with committed partners in the state to ensure the best methods are being incorporated into the plan, and we commend OCFS for turning to existing partners and voices in the field for best-practices to incorporate in this comprehensive plan. We ask for more clarity in where the funding to support this plan will come from, and ASW:NYSAN is committed to supporting the State and OCFS to provide greater access and higher quality programming across New York State.